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Attorneys for Defendant-Counterclaimant  
**HONEYWELL INTERNATIONAL INC.**  
and Counterclaimant **HONEYWELL**  
**INTELLECTUAL PROPERTIES INC.**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

TELEDYNE TECHNOLOGIES INC., a ) Case No. CV 06-06803  
Delaware corporation, )  
Plaintiff, )  
vs. ) Assigned to: Hon. Margaret M. Morrow  
HONEYWELL INTERNATIONAL )  
INC., a Delaware corporation, ) **DECLARATION OF EPHRAIM D.**  
Defendant. ) **STARR IN SUPPORT OF**  
 ) **HONEYWELL'S MARKMAN**  
 ) **RESPONSIVE BRIEF**  
HONEYWELL INTERNATIONAL )  
INC. and HONEYWELL ) Date: January 28, 2008  
INTELLECTUAL PROPERTIES INC., ) Time: 9:00 a.m.  
a Delaware corporation, ) Place: Courtroom 780  
Counterclaimants. )  
vs. )  
TELEDYNE TECHNOLOGIES INC., a )  
Delaware corporation, )  
Counterdefendant. )

1                   **DECLARATION OF EPHRAIM D. STARR**

2                   I, Ephraim D. Starr, declare as follows:

3                   1. I am a member of the Bar of the State of California and am a partner at  
4 Kirkland & Ellis LLP, attorneys of record for Defendant-Counterclaimant Honeywell  
5 International Inc. and Counterclaimant Honeywell Intellectual Properties Inc.  
6 (collectively “Honeywell”). I submit this declaration on the basis of personal,  
7 firsthand knowledge in support of Honeywell’s *Markman* Responsive Brief, and if  
8 called upon to do so, would and could competently testify as follows:

9                   2. A true and correct copy of Teledyne’s Supplemental Preliminary  
10 Infringement Chart for the Presently Asserted Independent Claims of U.S. Patent No.  
11 6,181,990 is attached hereto as Exhibit M.

12                  3. A true and correct copy of U.S. Patent 6,047,165 is attached hereto as  
13 Exhibit N.

14                  4. A true and correct copy of U.S. Patent 5,351,194 is attached hereto as  
15 Exhibit O.

16                  5. A true and correct copy of a letter from Honeywell counsel Luke L.  
17 Dauchot to Teledyne counsel Frederick A. Lorig, dated October 31, 2007, is attached  
18 hereto as Exhibit P.

19                  6. A true and correct copy of the file history of U.K. Patent Application No.  
20 0323990.2, the U.K. counterpart to Teledyne’s U.S. Patent 6,915,189, is attached  
21 hereto as Exhibit Q.

22                  7. A true and correct copy of a document produced by Teledyne in this case  
23 as Bates numbers TDY0003057-3058 is attached hereto as Exhibit R.

24                  8. A true and correct copy of a document produced by Teledyne in this case  
25 as Bates numbers TDY0003054-3056 is attached hereto as Exhibit S.

1       9. A true and correct copy of a document produced by Teledyne in this case  
2 as Bates number TYD0085552 is attached hereto as Exhibit T. Honeywell has made  
3 repeated requests for the attachments to this email; Teledyne has not produced them  
4 but has agreed to continue its searches for them.

5       10. A true and correct copy of excerpts from the file history of U.S. Patent  
6 6,477,152 are attached hereto as exhibit U. The excerpts include Honeywell's May  
7 13, 2002 Response to Office Action as well as the June 17, 2002 Notice of Allowance.

8           I declare under penalty of perjury under the laws of the United States of  
9 America that the foregoing is true and correct.

10          Executed this 17th day of December, 2007 at Los Angeles, California.

11  
12           By: /s/ Ephraim D. Starr  
13           Ephraim D. Starr  
14           KIRKLAND & ELLIS LLP

15           Attorneys for Defendant  
16 HONEYWELL INTERNATIONAL INC.  
17 and Counterclaimants  
18 HONEYWELL INTERNATIONAL INC.  
19 and HONEYWELL INTELLECTUAL  
20 PROPERTIES INC.